

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

BEN H. DROSTE AND CALVIN CASH,
Individually and as Class Representatives,

Plaintiffs,

V.

VERT CAPITAL CORP., WOLFF-FORDING
HOLDINGS, LLC, AND WOLFF-FORDING & CO.,

Defendants.

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) **Civil Action No.: 3:14-cv-00467**
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**PLAINTIFFS' MOTION TO CONTINUE
FINAL PRETRIAL CONFERENCE AND TRIAL**

COME NOW Plaintiffs, Ben H. Droste and Calvin Cash, on behalf of themselves and all others similarly situated, by counsel, and respectfully move the Court for the entry of an order, substantially in the form of the Proposed Order attached to this Motion, continuing all pretrial deadlines, including the final pretrial conference scheduled for March 2, 2015, and trial scheduled for March 17, 2015, pending the Court's ruling on Plaintiffs' previously filed Motion for Class Certification (Doc. 47) and Motion for Entry of Default (Doc. 59), for the reasons set forth in the accompanying memorandum of law.

Dated: February 23, 2015

Respectfully submitted,

BEN H. DROSTE AND CALVIN CASH,
Individually and as Class Representatives

By: /s/ C. Michael DeCamps
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CERTIFICATE OF SERVICE

I, C. Michael DeCamps, hereby certify that on February 23, 2015, I caused a true and correct copy of Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion to Continue the Final Pretrial Conference and Trial, to be served on the following

Via regular mail:

Wolff-Fording Holdings, Inc.
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/s/ C. Michael DeCamps
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